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CICHANOWICZ, CALLAN, KEANE, VENGROW & TEXTOR, LLP Attorneys for Defendant American Export Lines 61 Broadway, Suite 3000 New York, New York 10006-2802 (212) 344-7042

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

OWOLABI SALIS

Plaintiff,

- against -

AMERICAN EXPORT LINES; AND ATLANTIC CONTAINER LINE

Defendants.

Civil Number: 07 CV 6164 (LMM)

ANSWER TO CROSS-CLAIM

Defendant American Export Lines by its attorneys, Cichanowicz, Callan, Keane, Vengrow & Textor, LLP for its Answer to the Cross-Claim by Co-Defendant American Export Line with docket number 07 CV 6164 as follows:

1. Repeats and realleges each and every admission, denial and denial of knowledge or information and affirmative defense contained in the Answer to the Complaint with the same force and effect as if herein set forth at length.

- 2. Admits this is a claim under the Court's Admiralty and Maritime Jurisdiction, and except where specifically admitted, denies each and every allegation contained in Paragraph "First" of Co-Defendant's Cross-Claim.
- 3. Denies knowledge and information sufficient to form a belief as to the allegations contained in Paragraph "Second" of Co-Defendant's Cross-claim.
- 4. Admits that Defendant American Export Lines is a corporation duly organized and existing pursuant to the laws of one of the States of the United States.
- 5. Denies each and every allegation contained in Paragraph "Fourth" of Co-Defendant's Cross-Claim.
- 6. Denies each and every allegation contained in Paragraph "Fifth" of Co-Defendant's Cross-Claim.

WHEREFORE, Defendant American Export Lines demands judgment awarding Defendant American Export Lines costs, fees, including reasonable attorney's fees and disbursements of this action, and further demands judgment against the Co-Defendant Atlantic Container Line, for all sums which may be recovered by Plaintiff against Defendant American Export Lines, costs, fees including reasonable attorney's fees and disbursements of this action, and for such other and further relief as to the Court may seem just and proper.

Dated: New York, New York August 20, 2007

Respectfully submitted,

CICHANOWICZ, CALLAN, KEANE, VENGROW & TEXTOR, LLP Attorneys for Defendant American Export Lines

By: /s/Stephen H. Vengrow
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(212) 344-7042

To: Salis & Associates, P.C. Attorneys for Plaintiff 42 Broadway, Room 1133 New York, New York 10004 (212) 655-5749

> Mahoney & Keane Attorneys for Defendant Atlantic Container Line 111 Broadway, Floor 10 New York, New York 10006 (212) 385-1422

CERTIFICATE OF SERVICE BY ECF AND BY REGULAR U.S. MAIL

The undersigned declares under penalty of perjury that the following is true and correct:

- 1. I am over the age of eighteen years and I am not a party to this action.
- 2. On August 20, 2007, I served a complete copy of **Defendant American Export Lines' Answer to Crossclaim** by ECF to the following attorneys at their ECF registered address and by regular U.S. mail at the following addresses:

Salis & Associates, P.C. 42 Broadway, Room 1133 New York, New York 10004 (212) 655-5749

Edward Keane, Esq. Mahoney & Keane Attorneys for Defendant Atlantic Container Line 111 Broadway, 10th Floor New York, New York 10006 (212) 385-1422

> / s / Patrick Michael DeCharles, II Patrick Michael DeCharles, II

DATED:

August 20, 2007

New York, New York